



Republican National Committee

Jay C. Banning
Director of Administration
Comptroller

RECEIVED
FEDERAL ELECTION
COMMISSION
ADMINISTRATIVE DIVISION
Apr 8 3 56 PM '94

April 6, 1994

Ms. Amy Suzanne Reynolds
Reports Analyst
Report Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Dear Ms. Reynolds:

Attached you will find the Republican National Committee's (RNC) response to your March 23, 1994 letters requesting additional information (RFAI) concerning the RNC's 1993 monthly reports.

1. February 1993 Monthly Report

The H1 Schedule is attached as an amendment to the February Report

The H4 Schedule is hereby amended to reflect the aggregate year-to-date total for administrative expenses of \$1,137,000.13.

We are aware that although nonfederal transfers are reflected on Line 18 of Schedule A these transfers should not be itemized on an accompanying Schedule A but rather *only* on Schedule H3. Therefore, the nonfederal transfers so itemized on Schedule A should be deleted on this Report and all subsequent RNC 1993 reports. They should only be reflected on Schedule H3.

2. March 1993 Monthly Report

The RNC is well aware of the limit placed upon its presidential "coordinated party expenditures" (441a(d)) and did not exceed its 1992 limit as suggested by the RFAI. The RNC expended a total of \$10,330,965.14. The FEC calculation does not take into consideration three (3) refunds received in relation to its presidential coordinated expenditures as reported on the RNC's March 1993 Monthly Report and the 1992 Post-

Election Report (see attached documentation). The total amount of presidential coordinated refunds (those already acknowledged by the Commission as well as those additional refunds referred to above) amounts to \$69,445.93.

The RNC has filed an amendment to its 1993 February Monthly Report, including the H1 Schedule reflecting a federal allocation of 60%.

March Monthly Report Schedule H4 aggregate year-to-date figure for administrative costs: \$2,233,090.53.

3. April 1993 Monthly Report

A copy of page 45 of the RNC's April Monthly report is attached which together with the other pages reflects a total of \$413,734.32 in itemized individual contributions.

See H1 amendment to the RNC's February Report.

See amendment to Schedule F indicating the federal candidate supported in the Texas special election for U.S. Senate.

T3 Fundraising event: In preparing for the fundraising event at issue (T3), the RNC anticipated that funds would be deposited into both its federal and nonfederal accounts, treating the fundraiser as a joint federal/nonfederal event. As a result, it estimated the federal as well as the nonfederal share of costs. The RNC made expenditures for the T3 event out of the federal account as required by FEC Regulations at 11 C.F.R. §106.5(f). It was only after the final tally of receipts at the end of the month that it became apparent that all the proceeds were nonfederal, resulting in the nonfederal transfer reported on H3.

April 1993 Monthly Report Schedule H4 administrative expense total: \$3,348,412.91.

4. May 1993 Monthly Report

May Monthly Report Schedule H4 aggregate year-to-date figure for administrative expenses: \$4,573,820.11.

See attached amended Schedule F identifying the U.S. Senate candidate supported in the 1993 Texas special election.

5. June 1993 Monthly Report

June Monthly Report Schedule H4 aggregate year-to-date figure for administrative expenses: \$5,840,134.22.

See attached amended Schedule F identifying the U.S. Senate candidate supported in the 1993 Texas special election.

6. July 1993 Monthly Report

With regard to the question of presidential coordinated party expenditures, see comments made in paragraph 2.

See H1 amendment to the February Monthly Report attached.

July Monthly Report Schedule H4 aggregate administrative expense total: \$7,208,570.21.

7. August 1993 Monthly Report

The RFAI questions the total of itemized individual contributions reported, suggesting that a number of pages may be missing from the Report. Because there is no identification of which pages are missing from Schedule A Line 11a, the RNC is submitting another copy of its August Monthly Report's itemized contributors which totals, \$1,382,640.15.

See Schedule H1 amendment attached.

August Monthly Report Schedule H4 aggregate administrative expense year-to-date total: \$9,063,799.60.

8. September 1993 Monthly Report

Attached is page 211 from the September Monthly Report as requested in the RFAI. The total itemized individual contributions computed for the September Report reflects a total of \$1,063,118.95.

The RNC made certain 1992 presidential coordinated expenditures to The November Company, the entity responsible for media purchases for the presidential campaign. The November Company in turn utilized a number of vendors for the actual purchases. The November Company had disbanded before National Media had determined that a refund was due resulting from RNC payments. As a result, National Media sent the refund directly to the RNC.

September Monthly Report Schedule H4 aggregate year-to-date administrative expense total: \$10,586,104.21.

See attached amendment to Schedule F identifying U.S. Senate candidate supported in 1993 Texas special election.

9. October 1993 Monthly Report

With regards to RNC 1992 presidential coordinated expenditures, see comments reflected in paragraph 2 above.

The RNC has provided an H1 Schedule, attached.

October Monthly Report Schedule H4 aggregate year-to-date administrative expense total: \$12,292,816.27.

10. November 1993 Monthly Report

With reference to the RFAI suggestion that the contribution refunds reflected on the November 1993 Monthly Report were returned because the contributions were excessive, that is an erroneous assumption. One 1992 contribution was mistakenly deposited into the federal account instead of the nonfederal and was immediately refunded to the contributor when brought to the RNC's attention. All other contribution refunds reflected on the report were refunds of 1992 contributions at the request of the individual contributors and were not excessive contributions to the RNC.

See Schedule H1 attached.

T9 fundraising event: The nonfederal share of fundraising costs reported on Schedule H3 as \$30,156.66 is erroneous. This figure represented the nonfederal share of expenses prior to the voiding of certain disbursement checks. The revised nonfederal share for the T9 event was \$18,330.94, the amount actually transferred by the nonfederal account. Attached is the amended Schedule H3, reflecting the accurate figure.

November Monthly Report Schedule H4 aggregate year-to-date administrative expense total: \$13,772,640.32.

11. December 1993 Monthly Report

Schedule H1 attached.

December Monthly Report Schedule H4 aggregate year-to-date administrative expense total: \$15,554,513.70.

If you have further questions or need additional clarification on certain responses, please contact Pat Huyek at 863-8560.

Sincerely,



Jay C. Banning

34038902525

1. FEBRUARY 1993 MONTHLY REPORT

94038702526

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

RECEIVED
FEDERAL ELECTION
COMMISSION
ADMINISTRATIVE DIVISION
APR 8 2 1994

USE FEC MAILING OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full) REPUBLICAN NATIONAL COMMITTEE		2. FED IDENTIFICATION NUMBER C 00003418
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 310 First Street S E		
CITY, STATE and ZIP CODE Washington, D C 20003		3. This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On:

<input checked="" type="checkbox"/> February 20	<input type="checkbox"/> June 20	<input type="checkbox"/> October 20
<input type="checkbox"/> March 20	<input type="checkbox"/> July 20	<input type="checkbox"/> November 20
<input type="checkbox"/> April 20	<input type="checkbox"/> August 20	<input type="checkbox"/> December 20
<input type="checkbox"/> May 20	<input type="checkbox"/> September 20	<input type="checkbox"/> January 31

☐ Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☒ YES ☐ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>Jan 1, 1993</u> through <u>Jan 31, 1993</u>		
6. (a) Cash on Hand January 1, 19 <u>93</u>			\$ 2,256,421.73
(b) Cash on Hand at Beginning of Reporting Period		\$ 2,256,421.73	
(c) Total Receipts (from Line 19)		\$ 2,226,954.27	\$ 2,226,954.27
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 4,483,376.00	\$ 4,483,376.00
7. Total Disbursements (from Line 30)		\$ 2,045,942.82	\$ 2,045,942.82
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 2,437,433.18	\$ 2,437,433.18
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$ 2,625.11	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		\$ None	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of ~~Treasurer~~ Asst. Treasurer

Jay C Banning

Signature of Treasurer

J. C. Banning

Date

2/17/93

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X

(revised 1/1/91)

94038202527

DETAILED SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS
PAGE 2, FEC FORM 3X

(revised 1-1-91)

NAME OF COMMITTEE REPUBLICAN NATIONAL COMMITTEE		REPORT COVERING PERIOD FROM Jan 1, 1993 TO Jan 31, 1993	
		COLUMN A Total This Period	COLUMN B Calendar Year
I. Receipts			
11. Contributions (other than loans) From:			
a. Individual Persons Other Than Political Committees			
i. Itemized (use Schedule A)	273,175.00	273,175.00	
ii. Unitemized	1,835,235.16	1,835,235.16	
iii. Total (add i and ii) >	2,108,410.16	2,108,410.16	
b. Political Party Committees			
c. Other Political Committees (such as PACs)			
d. Total Contributions (add a iii, b and c) >	2,108,410.16	2,108,410.16	
12. Transfers From Affiliated/Other Party Committees	1,035.00	1,035.00	
13. All Loans Received			
14. Loan Repayments Received			
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.)	70,814.20	70,814.20	
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees			
17. Other Federal Receipts (Dividends, Interest, etc.)			
18. Transfers from Nonfederal Account for Joint Activity	46,694.91	46,694.91	
19. Total Receipts (add 11d, 12, 13, 14, 15, 16, 17, and 18) >	2,226,954.27	2,226,954.27	
20. Total Federal Receipts (subtract line 18 from line 19) >	2,180,259.36	2,180,259.36	
II. Disbursements			
21. Operating Expenditures:			
a. Shared Federal/Non-Federal Activity (from Schedule H)			
i. Federal Share	707,463.24	707,463.24	
ii. Non-Federal Share	484,798.93	484,798.93	
b. Other Federal Operating Expenditures	828,951.65	828,951.65	
c. Total Operating Expenditures (Add a i, a ii, and b) >	2,021,213.82	2,021,213.82	
22. Transfers to Affiliated/Other Party Committees	12,000.00	12,000.00	
23. Contributions to Federal Candidates/Committees and Other Political Committees			
24. Independent Expenditures (use Schedule E)			
25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F)			
26. Loan Repayments Made			
27. Loans Made			
28. Refunds of Contributions To:			
a. Individuals/Persons Other Than Political Committees	12,729.00	12,729.00	
b. Political Party Committees			
c. Other Political Committees (such as PACs)			
d. Total Contribution Refunds (Add a, b and c) >	12,729.00	12,729.00	
29. Other Disbursements			
30. Total Disbursements (add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29) >	2,045,942.82	2,045,942.82	
31. Total Federal Disbursements (subtract line 21 a ii from line 30) >	1,561,143.89	1,561,143.89	
III. Net Contributions/Operating Expenditures			
32. Total Contributions (other than loans)(from line 11d)	2,108,410.16	2,108,410.16	
33. Total Contribution Refunds (from line 28d)	12,729.00	12,729.00	
34. Net Contributions (other than loans)(subtract line 33 from 32)	2,095,681.16	2,095,681.16	
35. Total Federal Operating Expenditures (add 21 a i and 21 b) >	1,536,414.89	1,536,414.89	
36. Offsets to Operating Expenditures (from line 15)	70,814.20	70,814.20	
37. Net Operating Expenditures (subtract line 36 from 35) >	1,465,600.69	1,465,600.69	

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METHOD OF ALLOCATION FOR SHARED FEDERAL
AND NON-FEDERAL ADMINISTRATIVE EXPENSES
AND GENERIC VOTER DRIVE COSTS

NAME OF COMMITTEE

REPUBLICAN NATIONAL COMMITTEE

NATIONAL PARTY COMMITTEES

FIXED FEDERAL PERCENTAGE (CHECK THE APPROPRIATE LINE AND ENTER % IN BOX TO RIGHT) 60 %

PRESIDENTIAL YEAR (65%)

✓ ALL OTHER YEARS (60%)

HOUSE AND SENATE PARTY CAMPAIGN COMMITTEES

MINIMUM FEDERAL PERCENTAGE (65%) (IF CHECKED, ENTER 65% IN BOX TO RIGHT) %

OR

FUNDS EXPENDED:

ESTIMATED DIRECT CANDIDATE SUPPORT — FEDERAL %

ESTIMATED DIRECT CANDIDATE SUPPORT — NON-FEDERAL %

ADJUSTMENTS TO FUNDS EXPENDED:

ACTUAL DIRECT CANDIDATE SUPPORT — FEDERAL \$ %

ACTUAL DIRECT CANDIDATE SUPPORT — NON-FEDERAL \$ %

NOTE: FUNDS EXPENDED MUST BE USED IF THE FEDERAL PROPORTION IS GREATER THAN 65% IN ANY YEAR.

SEPARATE SEGREGATED FUNDS AND NON-CONNECTED COMMITTEES

FUNDS EXPENDED:

ESTIMATED DIRECT CANDIDATE SUPPORT — FEDERAL %

ESTIMATED DIRECT CANDIDATE SUPPORT — NON-FEDERAL %

ADJUSTMENTS TO FUNDS EXPENDED:

ACTUAL DIRECT CANDIDATE SUPPORT — FEDERAL \$ %

ACTUAL DIRECT CANDIDATE SUPPORT — NON-FEDERAL \$ %

STATE AND LOCAL PARTY COMMITTEES

BALLOT COMPOSITION

CHECK ALL OFFICES APPEARING ON THE NEXT GENERAL ELECTION BALLOT:

	NUMBER OF POINTS
1. PRESIDENT <input type="checkbox"/> (1 POINT)	
2. U.S. SENATE <input type="checkbox"/> (1 POINT)	
3. U.S. CONGRESS <input type="checkbox"/> (1 POINT)	
4. SUBTOTAL — FEDERAL (ADD 1, 2, AND 3)	
5. GOVERNOR <input type="checkbox"/> (1 POINT)	
6. OTHER STATEWIDE OFFICE(S) <input type="checkbox"/> (1 OR 2 POINTS)	
7. STATE SENATE <input type="checkbox"/> (1 POINT)	
8. STATE REPRESENTATIVE <input type="checkbox"/> (1 POINT)	
9. LOCAL CANDIDATES <input type="checkbox"/> (1 OR 2 POINTS)	
10. SUBTOTAL — NON-FEDERAL (ADD 5, 6, 7, 8, AND 9)	
11. TOTAL POINTS (LINE 4 PLUS LINE 10)	

FEDERAL ALLOCATION = LINE 4 DIVIDED BY LINE 11 %

94038902529

Federal Election Commission
ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

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and Registration

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Records

DATE OF RECEIPT

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PREPARED

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4-12-94